

UPPFÖRANDEKOD

VECTO's vision är att vara ledande inom logistik och materialhanteringslösningar med smarta tekniklösningar för en hållbar morgondag. För att leva upp till vår vision behöver vi ständigt utvecklas men aldrig genom att tumma på ett ansvarsfullt företagande.

I vår uppförandekod sammanfattar vi hur vi alla ska agera för att bedriva vår verksamhet på ett etiskt, socialt och miljömässigt vis. VECTO's organisation bygger på frihet under ansvar. Vi ger stor individuell frihet men ställer också tydliga krav. I uppförandekoden har vi vår gemensamma grund för vårt ansvarsfulla företagande. Med en gemensam grund att stå på blir det lättare för var och en att ta ansvar.

Om uppförandekoden

Uppförandekoden, tillsammans med våra kärnvärden (enkelhet, effektivitet, förändring, ansvar & frihet), är grunden för hur vi uppträder och agerar i vårt dagliga arbete. Uppförandekoden sammanfattar de etiska värderingar som vi (VECTO) anser ska gälla i vår verksamhet, anger miniminivån för acceptabelt uppförande och omfattar alla medarbetare inom företaget. VECTO accepterar inga handlingar som strider mot uppförandekoden. Koden är baserad på FN:s Global Compact, ILO:s kärnkonventioner, FN:s allmänna förklaring om de mänskliga rättigheterna samt OECD:s riktlinjer för multinationella företag, konkurrenslagstiftning och anti- korruptionsregler.

Denna uppförandekod har antagits av styrelsen i **VECTO ENGINEERING AB** och ändringar eller dispenser kan enbart utfärdas av styrelsen.

15 January 2025, Arkelstorp



CODE OF CONDUCT

VECTO's vision is to be a leader in logistics and material handling solutions with smart technology solutions for a sustainable tomorrow.

To live up to our vision, we need to constantly develop, but never thumbs on responsible business. In our code of conduct, we summarize how we should all act to conduct our business in an ethical, social and environmental manner.

VECTO's organization is based on freedom under responsibility.

We give great individual freedom but also make clear demands. In the code of conduct, we have our common basis for our responsible business.

With a common foundation to stand on, it will be a lot easier for everyone to take responsibility.

Code of conduct

The code of conduct, together with our core values (simplicity, efficiency, change, responsibility & freedom), is the basis for how we behave and act in our daily work.

The Code of Conduct summarizes the ethical values that we (VECTO) consider to apply in our operations, states the minimum level of acceptable conduct and covers all employees within the company.

VECTO does not accept documents that violate the Code of Conduct.

The Code is based on the UN Global Compact, the ILO's core conventions, the UN Universal Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises, competition law and anti-corruption rules.



GENERAL PRINCIPLES

VECTO's operations are based on close and long-term relationships with customers, suppliers and other business partners, and we strive to be perceived as a credible, long-term and reliable partner.

Therefore, it is important that the business is conducted not only on the basis of business economic requirements, goals and guidelines, but also with high demands on integrity and ethics.

VECTO must, as a minimum, comply with applicable laws and regulations in Sweden where we conduct business and existing policies.

VECTO primarily chooses to collaborate with suppliers who share our principles.

These are found in this code of conduct and in our code of conduct for suppliers.

HUMAN RIGHTS

Everyone who works directly or indirectly for VECTO shall have the right to have their fundamental human rights respected in accordance with the UN Universal Declaration of Human Rights. We do not allow discrimination or harassment in any form.

The company's employees must be given equal opportunities for development regardless of gender, age, ethnic origin, religion, political opinions, sexual orientation, disability or other distinctive characteristics.

In cases where there are compensation gaps between, for example, men and women, we must actively work to even them out. We also work for a more even gender distribution and for an equal right to parental leave.

Terms of employment

The terms of employment, including financial compensation and working hours, offered to our employees must at least meet the minimum requirements of national legislation and collective agreements. All employees must receive their employment contract in writing and be informed of the terms of employment. Wages, working hours and conditions must be fair and reasonable.

Working environment

We strive to be a respected employer and constantly improve health and safety in the workplace.

We must ensure a good working environment from a physical, mental and social point of view, and strive to be attractive employers with regard to employees' personal development.

Necessary safety conditions must be provided, including appropriate equipment, training and information.

The relationship to and between employees must be based on mutual respect.

As a minimum, we must strictly comply with national health and safety laws as well as the health and safety regulations that follow from concluded agreements and / or collective agreements.

Child labor

The UN Convention on the Rights of the Child, the ILO Convention (No. 138) on the Minimum Age for Access to Work, and the ILO Convention (No. 182) on the Prohibition and Immediate Action to Abolish the Worst Forms of Child Labor, are guidelines for all activities.

Disciplinary actions

Employees must be treated with respect and dignity.

Under no circumstances may an employee be subjected to corporal punishment or other forms of physical, sexual, psychological punishment, harassment or coercion. Deductions from salary may not be made as a disciplinary sanction, unless this is regulated in a collective agreement or is approved by law.

Freedom of association

Employees shall be free to exercise their legal right to be members of, organize or work for organizations that represent their interests as employees.

Gender equality, diversity and discrimination

We do not allow discrimination or harassment in any form.

The company's employees must be given equal opportunities for development regardless of gender, age, ethnic origin, religion, political opinions, sexual orientation, disability or other distinctive characteristics.

In cases where there are compensation gaps between, for example, men and women, we must actively work to even them out. We also work for a more even gender distribution and for an equal right to parental leave.

See also our CSR initiative according to UN's Sustainable Development Goals, Goal no 5 (Gender equality)

Forced labor

We do not accept forced labor or involuntary or unpaid work in any form.
This includes contracts under forced labor and illegal labor.
We also do not accept methods that restrict the free movement of employees.
No person may be detained at work against his will.

Political commitment

We observe political neutrality.
Neither the name VECTO nor any resources under the control of the company may be used to promote the interests of political parties or candidates.

BUSINESS ETHICS

Anti-corruption

We do not accept corruption, bribery or unfair anti-competitive practices.
Purchases, sales and marketing of our products and services must be handled professionally and in accordance with relevant laws and regulations.
We follow applicable laws and regulations regarding anti-corruption, including the Business Code

Terms for discounts, commissions and bonuses must be reasonable and stated in writing.
We shall not offer or give improper payment or other compensation to any person or organization for the purpose of persuading the person or organization to establish or maintain a business relationship with our company.

We shall not, directly or indirectly, request or accept any form of improper payment or other compensation provided for the purpose of establishing or maintaining a business relationship.

No employee shall give or receive gifts, rewards, benefits or offers that can be considered an improper benefit. Unfair advantage means something that can affect the recipient's behavior so that the person acts disloyally or illegally towards his employer for his own gain.

Gifts to government employees or in connection with public procurement are never allowed.
We will not do business with customers or suppliers, where we have reason to believe that they are violating our anti-corruption rules.

Export control and financial sanctions (See enclosed policy document 28-3)

The purpose of this policy is to ensure that complies with applicable laws and regulations for export control and financial sanctions imposed by national and international authorities. This includes complying with relevant regulations to prevent illegal trade and to minimize the risks of legal and financial sanctions.

Conflict areas

We must ensure that none of the business done in any way supports war, conflict, extremism, money laundering, drug or slave trade. This also includes the use of conflict minerals.

Counterfeit policy – Intellectual property and company property and resources

We respect the assets and intellectual property of other companies and protect our own both tangible and intangible assets from loss, theft or intrusion. VECTO steal not idea's from other companies and we will protect our own property and resources which may not be used for personal gain, for fraudulent purposes or in any other improper manner.

Customers and suppliers

We strive to provide products and services that meet or exceed customer expectations.
We base our relationship with business partners on sound business and market methods, a high ethical standard and reasonable and clear agreements.

Impartiality and conflicts of interest

VECTO's business relationships must be impartial and all business decisions must be made based on the company's best interests, without regard to personal relationships or benefits.
Conflicts of interest between employees and the company must be avoided.
Employees may not participate in activities that are contrary to VECTO's interests.

Disclosure of Information

We disclose our financial and non-financial information in line with applicable regulations and prevailing industry practices.

Healthy competition

We support fair and free competition in all parts of our business.

All forms of price collusion or market sharing between competitors, price controls of retailers, inhibition of innovation, exchange of trade secrets or other anti-competitive measures are prohibited.

In contact with competitors, VECTO's employees receive e.g. do not discuss division of markets, prices or other price-affecting terms or costs. If VECTO is contacted with proposals for such cooperation or if a situation arises that is difficult to assess whether it is permitted or not permitted, this must be reported to the company's (VECTO) board. In the event that a competition authority carries out an unannounced inspection, employees shall cooperate with the authority's dispatcher and not in any way obstruct the inspection.

Accounting and reporting

All financial transactions must be reported in accordance with generally accepted accounting principles.

SOCIETY

Communication

We have an open attitude in the dialogue with those who are affected by the company's operations.

We respond to inquiries from outsiders and communicate with stakeholders in a correct and efficient manner.

Questions about VECTO and our business are sent to info@vecto.com

Confidential and proprietary information

Employees must not disclose information that could have harmful consequences for the business or negative consequences for a colleague. For example, information about strategies, research, product development, business partners and financial results must be treated confidentially. Information about employees and their salaries can also be sensitive and should therefore be treated with caution.

In our contacts with other companies, we have a strong focus on confidentiality and regularly sign non-disclosure agreements to ensure that sensitive information is not passed on to third parties.

Data protection and data security policy

VECTO complies with the obligations imposed by the EU General Data Protection Regulation and national legislation on data protection and data security. VECTO's IT manager is responsible for ensuring that the company comply with the obligations in the data protection and data security legislation and monitors how data protection and data security are maintained. The company's CEO acts as the contact person for data protection and data security.

Use of social media

All employees should use social media with caution and avoid publishing content that could have negative consequences for collaborative relationships or business interests.

Never create the impression that you are speaking on behalf of the company in any personal communication on social media.

Local involvement

We want to contribute to strengthening the town and the surrounding area we operate in through a viable and long-term business. We strive to recruit new employees locally and offer jobs to young people.

Through an active and constructive dialogue with the local community, we also want to create conditions for growing locally.

Environmental responsibility

VECTO conducts active work to continuously reduce the company's direct and indirect environmental impact. The environmental perspective must be included in important decisions, in order to create long-term value for the company's customers, employees, shareholders and for society at large.

VECTO must follow its sustainability policy.

GHG Emissions Reporting - We report on/track/monitor our greenhouse gas emissions in order to accurately assess the influence of our organization on this area of the environment.

Sustainable resources management - We aim to use resources responsibly by avoiding excess material usage wherever possible.

Sustainable Goals

See enclosed document called – “Sustainable Development Goals”

Taxes

VECTO must comply with all applicable tax laws and tax rules.

Environment, CGH emissions, Energy and Recycling

Environment and CGH emissions

See our strategy specified under “Environmental responsibility” on the previous page.

See also our CSR initiative according to UN's Sustainable Development Goals, Goal no 12 (Responsible consumption) and Goal no 13 (Climate action)

Renewable and clean energy

See our CSR initiative according to UN's Sustainable Development Goals, Goal no 7 (Affordable and clean energy)

Reuse and recycling

See our CSR initiative according to UN's Sustainable Development Goals, Goal no 12 (Responsible consumption)

APPLICATION AND COMPLIANCE

Application of the code of conduct

We require that all employees follow the code of conduct. The company's CEO is ultimately responsible for implementing the code of conduct, informing employees of their rights and obligations and ensuring that all employees follow the code of conduct. The CEO is responsible for documenting and reporting to the Board once a year on how our own staff and our suppliers meet the requirements.

Compliance with the code of conduct

Each VECTO employee is responsible for reporting any cases of fraud or other criminal conduct. Violations of our code of conduct found immediately lead to disciplinary action, including termination and/or legal proceedings in more serious deviations. Employees who are unsure whether a specific behavior may violate the Code of Conduct should consult VECTO's CEO.

We encourage employees to report conditions that may conflict with the company's code of conduct to the CEO and/or by email to info@vecto.com

It does not entail any punishment or other negative consequences for persons who submit the report in good faith and in accordance with the purposes of the Code of Conduct.

FOR VECTO SUPPLIERS – SEE ALSO SEPARATE CODE OF CONDUCT FOR SUPPLIERS

Appendix 28-3:

Export control and financial sanctions (policy document 28-3)

The purpose of this policy is to ensure that VECTO complies with applicable laws and regulations for export control and financial sanctions imposed by national and international authorities. This includes complying with relevant regulations to prevent illegal trade and to minimize the risks of legal and financial sanctions.

1. Scope:

This policy applies to all employees, subsidiaries, suppliers and partners who are involved in any part of VECTO Engineering AB's operations, including, but not limited to, purchasing, selling, exporting, importing and transferring technology or services.

2. Compliance with Export Control Legislation:

All activities within VECTO Engineering AB that include the transfer of goods, technology or services to other countries or entities must comply with:

- National rules on export control (e.g. Swedish legislation, EU export control regulations).
- International regulations, including, but not limited to, the United States Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR).
- UN, EU and other applicable international sanctions regulations. Employees responsible for international transactions must ensure that the goods or services being exported are not prohibited or require export permits. This also applies to further exports to third countries.

3. Manage Financial Sanctions:

VECTO Engineering AB is obliged to comply with all economic and financial sanctions imposed by international organizations such as the UN, EU and individual nations such as the USA and Great Britain.

These sanctions may include:

- Prohibition against trading with specific countries, entities or individuals ("blacklists").
- Restrictions or prohibitions on the transfer of certain products or services to certain regions.
- Forbid financial transactions with sanctioned parties. Before new transactions are carried out, a risk assessment must be carried out to ensure that no sanctions are breached. Screening of partners through relevant sanctions lists is mandatory.

4. Export control and Sanction assessment:

For each international transaction, the following assessments must be made:

- Which country is the recipient of the goods or services.
- What type of product or service is being exported (is it subject to export control?).
- The status of the receiving entity or individual (are they listed on sanctions lists?).
- If an export license or special permit is required.

5. Reporting Crimes:

If any employee or partner suspects or discovers a violation of this policy or applicable legislation, it must be immediately reported to the CEO and/or to info@vecto.com

A thorough investigation must be carried out, and if necessary, measures must be taken to correct the situation and report to the relevant authorities.

6. Education and Awareness:

All employees involved in international transactions or who are responsible for exports, imports or financial transfers must undergo training to understand and comply with this policy. This training must be mandatory and regularly updated to ensure awareness of new regulations and changes in export controls and sanctions.

7. Liability:

Every individual employee within VECTO Engineering AB who participates in international business is responsible for carrying out checks and ensuring compliance with this policy.

VECTO Engineering AB senior management has the ultimate responsibility for monitoring policy implementation and compliance.

8. Consequences of violation:

Violations of this policy may result in severe legal penalties, including fines and imprisonment for the individual as well as sanctions against the company as a whole. Internal disciplinary action may also be taken against employees who violate the policy, including termination.

9. Review and Update:

This policy shall be reviewed and updated annually, or earlier as necessary, to ensure that it remains in line with changes in applicable legislation and the company's operations.

This policy aims to maintain the highest standards of business ethics and compliance within VECTO Engineering AB and ensures that the company complies with international regulations for export control and economic sanctions.

Appendix 22-5:

"Sustainable Development Goals" – app. 22.5

This is how we supports UN's Sustainable Development Goals

During last year VECTO's Corporate Social Responsibility-strategy and concrete Corporate Social Responsibility-initiatives have directly supported six global goals:



Goal 4, Quality education

- by revising our policies within recruitments, work environment, employee education and training, conditions for senior employees.

Based on relevant training and education we focus on achieving enhanced production efficiency and on lowering the risk of work-related injury incidents. Our efforts address both physical and mental work environment issues and conditions.

Our employees have the possibility to participate in relevant work-related education and training fully financed or co-financed by the employer. The objective is e.g. to contribute to increase and maintain the employee satisfaction rates, to create long-termed value for both parties, to handle and reduce the risk of work injuries and to limit sick leave rates. Going forward VECTO will initiate more focus on near misses and activities to prevent near misses and lost time injuries.

VECTO has previously and will going forward to perform an employee satisfaction survey which is a valuable part of forming the human resource strategies and objectives.



Goal 5, Gender equality

- by having formulated clear principles for how to ensure that both genders are treated equally and fair.

We have formulated a policy on gender equality that covers both managerial layers and employee layers within our organization. The policy ensures that we are compliant with all legal requirements in the countries where we operate, and that gender, religion, sexual observation e.g. is never a criterion when selecting who to employ, promote or dismiss.

By acting per these principles, we ensure that only qualifications and work-relevant experiences are in focus and are the foundation for the evaluation and rewarding of all VECTO people.



Goal 7, Affordable and clean energy

- by setting up specific policies on energy consumption and energy efficiency.

It is our objective to reduce our relative energy consumption and to move towards using more environmental and climate friendly energy sources. We seek to contribute to energy optimizations knowledge for our employees and customers.

On an on-going basis, we evaluate our equipment and installations to identify optimization possibilities, and development projects are initiated whenever relevant and viable.

We promote active dialogue with all relevant stakeholders, customers, employees, authorities and organizations on best practices within energy consumption. We communicate actively on energy issues and report on our own progress within this field.



Goal 9, Industry, innovation and infrastructure

- by introducing up to date work procedures on integrating sustainable innovation goals in our product designs and principles.

We ensure that good practice on energy consumption, maintenance, service requirements and end-of-life de-assembly of our products are introduced wherever relevant. We pursue that at least one sustainable innovation activities, procedures, or principles are implemented each year.

We have formulated a procurement policy which coordinates and optimizes our sourcing conduct. The policy includes sustainability requirements for both products and services we buy and for the suppliers' way of running their businesses – we have this specified in our Supplier Code of Conduct.

We have established work procedures to ensure that our requirements for suppliers are followed. The procedures include a close on-going dialogue, on-site reviews, desk-top reviews and risk segmentation of the suppliers that ensures our focus and resources are used where most value can be created.

We adhere to the principle of engaging into a dialogue and development planning with suppliers that are not fully in line with our principles, but contracts and relations will be terminated in cases where breaches are not eliminated reasonably.



Goal 12, Responsible consumption and production

- by establishing clear and operational policies and guidelines to be followed daily throughout our operation.

Via these focuses we ensure correct registration, use and evaluation of all waste fractions, use of materials, water and electricity. We have carried out all mandatory and relevant materials and work process evaluations, including focus on hazardous waste and materials.

We have trained and informed all employees on best practices on material scrap reduction methods, and we perform follow ups on this on a regularly basis. We have introduced further requirements for our waste separations and downstream handling of waste.



Goal 13, Climate action

- by formulating a policy with the objective of reducing VECTO's climate footprint.

When offering tenders and entering contracts with vendors we ensure that environmental and climate issues are part of the selection criteria.

Certificate of compliance with the code of conduct

I hereby certify that I have read and understood the contents of VECTO's Code of Conduct and confirm that I will follow these guidelines in my daily work.

Signature:

Date:

Name clarification:

FOR VECTO SUPPLIERS, SEE ALSO SEPARATE CODE OF CONDUCT >>>>>>>>>

All VECTO suppliers need to sign Supplier CoC as a proof that they have read, understood and accept to follow our specific demands for supplier working for VECTO

For VECTO suppliers, see page 11-15 (+ Separate CoC for suppliers)

VECTO's - Supplier Code of Conduct

We take responsibility for our impacts on society and surroundings and we want our suppliers to do the same.

This Supplier Code of Conduct (SCoC) describes our responsibility and sustainability requirements to you as a supplier. You must comply with all applicable laws and regulations in the countries where you operate, and in accordance with United Nations' Bill of Human Rights and UN Guiding Principles on Business and Human Rights, and you must meet the requirements in this SCoC. If differences exist between applicable laws and regulations, this SCoC or our contract with you must follow the stricter requirements. **End of document, please confirm and approve our mandatory demands which you need to follow and fulfill as our supplier.**

Scope of the SCoC

This SCoC applies to all suppliers that deliver products or services to VECTO AB or any of its subsidiaries.

We expect you to set up SCoC requirements for your own suppliers in level with this SCoC. You must be able to document that your own suppliers have been informed of your requirements and that you practice follow up.

This SCoC does not limit your obligations according to your supplier contract with us.

Compliance, follow up and documentation

The term "must": You are expected to comply with all requirements that contain the term "must". If this is not the case now, you must prepare a plan for coming into compliance.

The term "should": You are expected to work for progress on requirements that contain the term "should".

You must keep appropriate records to document compliance with the SCoC.

We reserve the access to perform audits/reviews of your compliance with this SCoC, including your suppliers. Audits/reviews may range from a re-quest for documentation to an announced or unannounced on-site audit/review. Your full collaboration is expected during audits/reviews.

Breach of the SCoC

Any breach of this SCoC is considered a material breach of the supplier contract.

If a breach is identified, we will ask you to make improvements. If this is not possible or if the breach is serious, this may lead to termination of our business relationship, without the right to any compensation from your side.

If you identify any breach of the SCoC when you do business with us, you must report it to us.

Specific practice requirements Human Rights

- Policy

You must have a human rights policy, that is appropriate to the size, nature and risks of your operations.

Forced labour

You must not use or employ forced labour or trafficked persons.

No worker must be required to lodge a money deposit or original identity papers to be employed or to keep their employment.

- Discrimination

You must treat all workers fairly.

You must not discriminate against or harass any group or individual in your employment practices on the grounds of e.g. gender, age, race, sexual orientation, nationality or ethnic origin, disability, political affiliation, union membership or religious beliefs.

- Freedom of association

You must respect the right of your workers to establish, join or not join trade unions and any other association of their choice.

You must support the right of representative unions and staff to bargain collectively.

Where national law restricts the right to freedom of association and collective bargaining, you should allow workers to freely elect their own representatives to engage in dialogue with their management.

Labour standards

- Policy

You must have a labour policy, that is appropriate to the size, nature and risks of your operations. The policy must be clearly communicated to all employees.

The policy should as a minimum cover: Contractual terms, working time, wages, health and safety, disciplinary and termination procedures.

- Working conditions

You must ensure that working conditions, hours and voluntary overtime are in accordance with local regulation and industry practice, and that wages and benefits meet legally mandated minimums without unauthorised deductions.

Employees must not be required to work more than 48 hours a week. Temporary overtime shall be voluntary, not exceed 12 hours a week and be remunerated at a higher rate than the hourly rate. Any lower maximum hours according to applicable local laws shall be respected.

You must allow all workers to have adequate rest periods, with at least one uninterrupted day off per seven day week.

You must provide a signed contract for each employee setting out employment conditions in a language understandable to the individual concerned.

- Health and safety

You must provide a safe and healthy work place for all workers.

This includes, as a minimum, providing all workers with clean toilet facilities, access to clean water, adequate personal protective equipment, adequate health & safety training, adequate heat and ventilation, adequate emergency training and exits.

- Child labour

You must not use child labour.

The minimum age for employment or work must be 18 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. This does not prohibit participation in legitimate workplace apprenticeship programs.

- Management system

You should have a documented Health & Safety Management System appropriate to the size, nature and risks of your operations.

Environment

- Policy

You must have an environmental policy, that is appropriate to the size, nature and risks of your operations.

The policy is expected to address as a minimum; energy consumption, emissions to air, land and water, as well as management of hazardous materials and waste.

- Management system

You should have a documented Environmental Management System appropriate to the size, nature and risks of your operations.

- Risk identification

Where your activities involve an environmental risk, you should implement an effective system to identify and minimise potential hazards.

Ethics

- Policy

You must have a policy on ethical business and anti-corruption practice, that is appropriate to the size, nature and risks of your operations.

- Integrity

You must act in an ethical, fair and professional manner.

- Competition practices

You must not at any time operate in breach of competition regulations, such as illegal cooperation on pricing, illegal market sharing or other behaviour that is in breach of competition laws where you operate.

- Corruption

You must comply with applicable laws and regulations concerning bribery, corruption, fraud and similar. You must not offer or give an undue advantage or favour to any public official or other third party, neither directly or through an intermediary. You must not offer VECTO representatives bribe, entertainment or gift to influence how they do their job. Nor must you demand or accept bribes or other improper payment for yourself to act or refrain from doing your duties.

- **Export control and financial sanctions (See separate enclosed policy document 28-3)**

The purpose of this policy is to ensure that complies with applicable laws and regulations for export control and financial sanctions imposed by national and international authorities. This includes complying with relevant regulations to prevent illegal trade and to minimize the risks of legal and financial sanctions.

Appendix – policy doc 28-3

The purpose of this policy is to ensure that VECTO Engineering AB complies with applicable laws and regulations for export control and financial sanctions imposed by national and international authorities. This includes complying with relevant regulations to prevent illegal trade and to minimize the risks of legal and financial sanctions.

1. Scope:

This policy applies to all employees, subsidiaries, suppliers and partners who are involved in any part of VECTO Engineering AB's operations, including, but not limited to, purchasing, selling, exporting, importing and transferring technology or services.

2. Compliance with Export Control Legislation:

All activities within VECTO Engineering AB that include the transfer of goods, technology or services to other countries or entities must comply with:

- National rules on export control (e.g. Swedish legislation, EU export control regulations).
- International regulations, including, but not limited to, the United States Export Administration Regulations (EAR) and the International Traffic in Arms Regulations (ITAR).
- UN, EU and other applicable international sanctions regulations. Employees responsible for international transactions must ensure that the goods or services being exported are not prohibited or require export permits. This also applies to further exports to third countries.

3. Manage Financial Sanctions:

VECTO Engineering AB is obliged to comply with all economic and financial sanctions imposed by international organizations such as the UN, EU and individual nations such as the USA and Great Britain.

These sanctions may include:

- Prohibition against trading with specific countries, entities or individuals ("blacklists").
 - Restrictions or prohibitions on the transfer of certain products or services to certain regions.
 - Forbid financial transactions with sanctioned parties. Before new transactions are carried out, a risk assessment must be carried out to ensure that no sanctions are breached.
- Screening of partners through relevant sanctions lists is mandatory.

4. Export control and Sanction assessment:

For each international transaction, the following assessments must be made:

- Which country is the recipient of the goods or services.
- What type of product or service is being exported (is it subject to export control?).
- The status of the receiving entity or individual (are they listed on sanctions lists?).
- If an export license or special permit is required.

5. Reporting Crimes:

If any employee or partner suspects or discovers a violation of this policy or applicable legislation, it must be immediately reported to the CEO and/or to info@vecto.com

A thorough investigation must be carried out, and if necessary, measures must be taken to correct the situation and report to the relevant authorities.

6. Education and Awareness:

All employees involved in international transactions or who are responsible for exports, imports or financial transfers must undergo training to understand and comply with this policy. This training must be mandatory and regularly updated to ensure awareness of new regulations and changes in export controls and sanctions.

7. Liability:

Every individual employee within VECTO Engineering AB who participates in international business is responsible for carrying out checks and ensuring compliance with this policy.

VECTO Engineering AB senior management has the ultimate responsibility for monitoring policy implementation and compliance.

8. Consequences of violation:

Violations of this policy may result in severe legal penalties, including fines and imprisonment for the individual as well as sanctions against the company as a whole. Internal disciplinary action may also be taken against employees who violate the policy, including termination.

9. Review and Update:

This policy shall be reviewed and updated annually, or earlier as necessary, to ensure that it remains in line with changes in applicable legislation and the company's operations.

This policy aims to maintain the highest standards of business ethics and compliance within

VECTO Engineering AB and ensures that the company complies with international regulations for export control and economic sanctions.

Basis for the SCoC

This SCoC is inspired from and based on recognized international guidelines, including the OECD Guidelines for Multinational Enterprises, the UN Global Compact, the UN Guiding Principles on Business and Human Rights and relevant ILO Conventions.

More information

For more information, please contact VECTO at info@vecto.com or telephone +46 44 917 80.

Confirmation and approval from actual supplier

Supplier's signature

Company name:

Representative's name:

Representative's job title:

Date: